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SUPERFUND REMEDIAL DIVISION

December 7, 1994

NPE69242.02.02

Sean Sheldrake  
U.S. Environmental Protection Agency  
1200 Sixth Avenue, HW-113  
Seattle, WA 98101

Dear Sean:

Subject: Clarification of Asbestos Sampling Data  
Mine Operations Area Remediation  
Bunker Hill Superfund Site

Reference: (a) Addendum No. 1 to Final Bid Document, Mine Operations Area Remedial Action, Bunker Hill Superfund Site; prepared by CH2M HILL, dated August 24, 1994

(b) Summary Report of a Limited Asbestos Survey for Select Buildings at the Bunker Hill Superfund Site in Kellogg Idaho, prepared by MCS Environmental for Rust Remedial Services, dated October 27, 1994

(c) Letter from Rust Remedial Services to Frank Breidt/BLP requesting a contract adjustment for unidentified asbestos, dated December 2, 1994

I have reviewed the December 2 letter from Rust Remedial Services to the Bunker Limited Partnership (BLP) requesting a contract adjustment for assumed unidentified asbestos at the MOA and provide the following comments:

Concentrator Building

Rust appears to have misinterpreted both the Addendum No. 1 data and their own asbestos survey report [references (a) and (b), respectively]. In Rust's December 2 letter, under the subheading of *Concentrator Roof*, Rust states that the 3 layers of felt pad determined to be non-asbestos containing materials (non-ACM) per CH2M HILL's testing are actually 35-45% asbestos based on the Rust/MCS survey report. However, by reviewing the sketch of the roof layering system (included in the Addendum) and the material descriptions and analytical results of both data sets, it seems that Rust is comparing two distinctly different materials.

Addendum No. 1 shows the presence of 3 layers of "felt pads" sandwiched between a transite composite layer and a transite board. The Addendum No. 1 test results for the felt pads were all

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non-ACM. In the Rust/MCS survey, the felt pad layers (referred to in the MCS report as "fiber board") were also sampled and tested (MCS test numbers 49, 50, 51, 77, 78, 80, 81, 82). The Rust/MCS survey results confirm the Addendum No. 1 data that the felt pads/fiber boards are non-ACM. By Rust asserting that their data shows the felt pads are 35-45% asbestos, they seem to be erroneously interpreting the MCS "tar paper" layers (MCS test numbers 1, 2, 3, 4, 5, 6, 7, 8, 9) as the felt pad layers sandwiched between the transite layers.

#### Power House

Similar to the Concentrator Building results, Rust seems to have misinterpreted the data presented in Addendum No. 1. The Addendum summarized 6 asbestos sample results for the Power House (all being described as black resinous tar). Of these samples, one was determined to be 25% ACM; the others were determined to be non-ACM. Therefore, the Addendum No. 1 data clearly indicates that ACM is present in the Power House roofing system (in contrast to Rust's assertion that the Addendum data indicated no ACM presence). Also, Rust's December 2 letter cites ACM results for mastic and metal with silver paint, which could be a different material than that sampled by CH2M HILL.

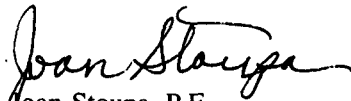
#### General

As stated in the contract documents and as reiterated in CH2M HILL's letter of November 8, 1994 to BLP, the limited asbestos analytical results that are included in *Part 6 - Contractor Data* of the MOA contract documents, is for informational use only. As stated, no warranty is given or implied to the accuracy of the information. As you are also aware, the information contained in Part 6 is not part of the contract documents. This is also conveyed in Section 3.1 of the General Conditions of the contract documents that provides a summary of the order of precedence between components of the contract document.

Should you need any further assistance concerning this matter, do not hesitate to contact me at (206) 453-5005, extension 5069.

Sincerely,

CH2M HILL

  
Joan Stoupa, P.E.  
Project Manager

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cc: Frank Breidt/Bunker Limited Partnership  
Bill Hudson/CH2M HILL-Kellogg  
Becky Goehring/EPA—Boise  
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